

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	

**RNK Inc., d/b/a RNK Communications
911 Compliance Status Report – April 11, 2007
FCC WC Docket No. 05-196**

In response to the Commission's letter of March 12, 2007, RNK Inc. d/b/a RNK Communications ("RNK") respectfully submits the herein report to the Commission regarding its compliance with the VoIP E911 Rules¹ as of April 11, 2007.

I. Provision of Compliant 911 Service

As of April 11, 2007, approximately 92.5% of RNK subscribers have access to E911 service as detailed in the VoIP E911 Rules.² Of the remaining 7.5% of RNK's subscriber base, 4% have access to "Basic 911,"³ and 3.5% have access to "Voice-Only" 911.⁴ Call centers are also employed as a method of redundancy to address any inherent gaps in the existing 911 infrastructure.

II. 911 Coverage

A. PSAPs serving areas where E911 is unavailable

A list of PSAPs serving areas where E911 is unavailable to RNK's subscribers is attached to this report as Exhibit A. Reasons for unavailability of E911 include, but are not limited to: 1) RNK's underlying 911 vendor is awaiting Selective Router connectivity; 2) the PSAP is upgrading its capabilities to enable

¹ 47 C.F.R. §§ 9.1-9.5.

² 47 C.F.R. § 9.5.

³ Basic 911 entails the routing of 911 calls to a 24x7 administration line of the geographically relevant PSAP and, when the PSAP is technically capable of receiving it, the caller's ANI is displayed.

⁴ "Voice-Only" 911 involves the delivery of 911 calls via the traditional 911 network to the geographically relevant PSAP serving the subscriber's Registered Location. Once connected, the emergency service responder has a verbal conversation with the 911 caller and, when the PSAP is technically capable of receiving it, the caller's Automatic Number Identification ("ANI") is displayed.

processing of VoIP 911 calls; 3) the PSAP is currently testing its ability to process VoIP 911 calls; and 4) the PSAP will not deploy a Basic 911 solution, in favor of awaiting an E911 solution.

B. Plan for coming into full compliance with VoIP E911 Rules

RNK is working diligently and in good faith with its third party 911 vendors to offer E911 service in all areas where technically feasible, and participates in status meetings, on at least a weekly basis, with one of its vendors. Over 150 of the PSAPs that currently cannot support VoIP E911 are scheduled to be deployed by June 29, 2007, and the 911 provider responsible for this deployment is working aggressively with the remaining PSAPs to ensure E911 roll-out in as expeditious a timeframe as is possible.

While RNK, other interconnected VoIP service providers, and 911 vendors, are working tirelessly to ensure a nationwide VoIP E911 solution, as this Commission is aware, not all PSAPs, statewide default answering points or local emergency authorities are capable of receiving or processing Automatic Number Identification ("ANI") and Automatic Location Identification ("ALI") information, as required by the VoIP E911 Rules. In fact, these limitations and the lack of resources available to interconnected VoIP service providers is so widely recognized and pervasive that a bill was submitted before the U.S. Senate to address the need for development of a plan allowing for the migration to a national IP-enabled E911 network.⁵ It is proposed that such a plan would include the identification of barriers to be overcome and funding sources to address those barriers, as well as the provision of a list by the Commission of PSAPS and types of services they support.⁶

III. 911 Routing Information/Connectivity to Wireline E911 Network

RNK uses best efforts to ensure that in all cases its subscribers' calls are routed "...to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."

Despite its vigilance in ensuring routing accuracy, there may be rare occasions when a subscriber's 911 call is misrouted due to the subscriber's error in submitting his/her Registered Location. In these cases, however, if not routed to the assigned PSAP, the call is typically routed to a PSAP within close proximity, or the call is answered by a call center which will itself transmit the call to the appropriate PSAP. Misrouting due to a Registered Location error on the part of the subscriber is not quantifiable by RNK or identifiable (in some cases) until the subscriber attempts to dial 9-1-1. Should an inaccurate Registered Location come to RNK's attention, it is corrected immediately.

⁵ "IP-Enabled Voice Communications and Public Safety Act of 2007." S 428, 110th Cong. (2007).

⁶ Id., sec. 5.

IV. New VoIP Customers and/or Marketing of VoIP Service in Non-Compliant Areas

RNK offers VoIP services primarily to independent resellers and agents on a wholesale basis and generally does not directly market VoIP services, as defined under the VoIP E911 Rules,⁷ to end users.⁸ In the limited marketing that RNK has directed to its resellers and agents, it did not actively market in areas that do not currently offer E911, however, because of the unlimited reach of Internet advertising, RNK ensured that 911/E911 coverage limitations were referenced.

While not directly marketing its VoIP service in areas that cannot currently sustain VoIP E911, RNK has made service available to subscribers who sign up in these areas once they have been fully notified of, and agreed to, the limitations of VoIP 911 service. Just 7.5% of all RNK subscribers are provided with a form of 911 other than E911, with less than 3.5% of total subscribers signing up after November 28, 2005. It is important to note that all of these subscribers have access to some form of 911, and that some form of 911 service is available to 100% of RNK's subscribers. RNK believes that serving as the underlying provider of VoIP services in locations where E911 is not yet available (often in more rural locations, where E911 may also not yet be available through wireless or landline service), but some form of 911 is, as providers work industriously together to make nationwide VoIP E911 a reality, promotes the Commission's mission to promote..."safety of life and property through the use of wire and radio communications"⁹ and, further, levels the playing field for informed consumers, regardless of their location.

Respectfully submitted by the
undersigned,

_____/s/_____
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DATED: April 11, 2007

⁷ 47 C.F.R. 9.3.

⁸ RNK launched a suite of consumer products under the "ReVoS" brand in September 2006 that are merely overlay services to a consumer's existing landline or cellular telephone plan.

⁹ 47 U.S.C. 151; *VoIP E911 First Report and Order* para. 29.

EXHIBIT A

PSAP Name	PSAP State	PSAP City
<u>Matanuska-Susitna Regional Communications Center</u>	AK	Palmer
<u>Riverside County Sheriff</u>	CA	Riverside
<u>CHP-Inland CC-Rancho Cucamonga</u>	CA	San Bernardino
<u>San Jose Police Department</u>	CA	San Jose
<u>Santa Clara County Communications Center</u>	CA	San Jose
<u>Humboldt County Sheriffs Department</u>	CA	Eureka
<u>Martin County Sheriffs Office</u>	IN	Shoals
<u>Las Vegas Metropolitan Police Department</u>	NV	Las Vegas
<u>Nye County Sheriff-Beatty</u>	NV	Beatty
<u>New York State Police-Hawthorne</u>	NY	Hawthorne
<u>Wyoming County Communications Center</u>	PA	Tunkhannock
<u>Bayonne Police Department</u>	NJ	Bayonne
<u>Bellmawr Police Department</u>	NJ	Bellmawr
<u>Bergenfield Police Department</u>	NJ	Bergenfield
<u>Bloomfield Police Department</u>	NJ	Bloomfield
<u>Burnham Police</u>	IL	Burnham
<u>Calumet Park Police</u>	IL	Calumet Park
<u>Camden Police Department</u>	NJ	Camden
<u>Cherry Hill Township Police</u>	NJ	Cherry hill
<u>Clark Police Department</u>	NJ	Clark
<u>Closter Borough - Cresskill Borough</u>	NJ	Closter
<u>Closter Borough - Norwood Borough</u>	NJ	Closter
<u>Closter Borough Police Department</u>	NJ	Closter
<u>Cumberland County Communications - Millville City</u>	NJ	Millville
<u>Cuyahoga Falls Police Department</u>	OH	Cuyahoga Falls
<u>Dolton Police Department</u>	IL	Dolton
<u>Dumont Borough - Haworth Borough</u>	NJ	Haworth
<u>Dumont Borough Police Department</u>	NJ	Dumont
<u>East Brunswick Police Department</u>	NJ	East Brunswick
<u>Edison Police Department</u>	NJ	Edison
<u>Edmond Central Communications</u>	OK	Edmond
<u>Elizabeth Police Department</u>	NY	Brooklyn
<u>Elmwood Park Borough Police Department</u>	NJ	Elmwood Park
<u>Englewood City Police Department</u>	NJ	Englewood
<u>Fair Lawn Police Department</u>	NJ	Fairlawn
<u>Freehold Township Police Department</u>	NJ	Freehold
<u>Ft Lee Borough Police Department</u>	NJ	Fort Lee
<u>Gloucester County Communications - Woolwich Township</u>	NJ	Swedesboro
<u>Hackensack City Police Department</u>	NJ	Lakewood
<u>Highland Park Police Department</u>	NJ	Highland Park
<u>Huber Heights Police</u>	OH	Huber Heights
<u>Hudson County Communications - Guttenberg Town</u>	NJ	Jersey City
<u>Hudson County Communications - North Bergen Township</u>	NJ	Jersey City

PSAP Name	PSAP State	PSAP City
<u>Jefferson Township Police Department</u>	NJ	Jefferson
<u>Jersey City Police Department</u>	NJ	Jersey City
<u>Kettering Police</u>	OH	Kettering
<u>Lawrence County 9-1-1</u>	OH	Ironton
<u>Lemoore Naval Air Station</u>	CA	Lemoore Station
<u>Leonia Borough Police Department</u>	NJ	Leonia
<u>Lincoln Park Police Department</u>	NJ	Lincoln Park
<u>Livingston Township Police Department</u>	NJ	Livingston
<u>Mahwah Township - Saddle River Borough</u>	NJ	Mahwah
<u>Mahwah Township - Upper Saddle River Borough</u>	NJ	upper saddle river
<u>Marlboro Township Police Department</u>	NJ	Morganville
<u>Melrose Park Police Department</u>	IL	Melrose Park
<u>Middletown Township Police Department</u>	NJ	Atlantic Highlands
<u>Monmouth County Communications - Colts Neck Township</u>	NJ	Freehold
<u>Monmouth County Communications - Long Branch City</u>	NJ	long branch
<u>Monmouth County Communications - Manalapan Township</u>	NJ	Manalapan
<u>Monmouth County Communications - Ocean Township</u>	NJ	Freehold
<u>Montclair Township Police Department</u>	NJ	Montclair
<u>Montgomery Township Police Department</u>	NJ	Montgomery Township
<u>Montville Township Police Department</u>	NJ	Montville
<u>Morris County Communications - Rockaway Borough</u>	NJ	Parsippany
<u>Newark City Police Department</u>	NJ	Newark
<u>North Brunswick Police Department</u>	NJ	North Brunswick
<u>Northwest Bergen Regional Communications</u>	NJ	Ridgewood
<u>Northwest Bergen Regional Communications - Ramsey Borough</u>	NJ	Ridgewood
<u>Ocean County Communications North - Jackson Township</u>	NJ	Toms River
<u>Ocean County Communications North - Lakewood Township</u>	NJ	Toms River
<u>Ocean County Communications Ocean - Point Pleasant Borough</u>	NJ	Toms River
<u>Ocean County Communications South - Barnegat Township</u>	NJ	Toms River
<u>Oklahoma City Police Department</u>	OK	Oklahoma City
<u>Old Bridge Township Police Department</u>	NJ	Old Bridge
<u>Osage County Sheriffs Office</u>	OK	Pawhuska
<u>Paramus Borough</u>	NJ	Paramus
<u>Paramus Borough - Rochelle Park Township</u>	NJ	Paramus
<u>Paramus Borough - Tenaflly Borough</u>	NJ	Tenaflly
<u>Paramus Borough - Tenaflly Borough</u>	NJ	Paramus
<u>Park Ridge Borough</u>	NJ	Park Ridge
<u>Parsippany Police Department</u>	NJ	Parsippany
<u>Passaic City Police Department</u>	NJ	Passaic
<u>Paterson City Police Department</u>	NJ	Paterson
<u>Pennsauken Township Police Department</u>	NJ	Pennsauken
<u>Piscataway Township Police Department</u>	NJ	Piscataway
<u>Portage County Sheriffs Office</u>	OH	Ravenna
<u>Princeton Township Police Department</u>	NJ	Princeton

PSAP Name	PSAP State	PSAP City
<u>Ridgefield Borough - Edgewater Borough</u>	NJ	Ridgefield
<u>Ringwood Borough Police Department</u>	NJ	Ringwood
<u>Roseland Borough Police Department</u>	NJ	Roseland
<u>Roselle Park Police Department</u>	NJ	Roselle Park
<u>Saddle Brook Police Department</u>	NJ	Saddle Brook
<u>Sayreville Borough Police Department</u>	NJ	Parlin
<u>Scotch Plains Police Department</u>	NJ	Scotch Plains
<u>Secaucus Town Police Department</u>	NJ	Secaucus
<u>Somerset County Communications - Bedminster Township</u>	NJ	Bedminster
<u>Somerset County Communications - Branchburg Township</u>	NJ	Branchburg
<u>Somerset County Communications - Branchburg Township</u>	NJ	Somerset
<u>South Brunswick Township Police Department</u>	NJ	Princeton
<u>South Plainfield Police Department</u>	NJ	south Plainfield
<u>Sparta Police Department</u>	NJ	Sparta
<u>Teaneck Township Police Department</u>	NJ	Teaneck
<u>Tulsa Public Safety Response Center-City</u>	OK	Tulsa
<u>Voorhees Township Police Department</u>	NJ	Voorhees
<u>Washington Township/Bergen County</u>	NJ	Washington TWP
<u>Wayne Township Police Department</u>	NJ	Wayne
<u>West Milford Township Police</u>	NJ	West Milford
<u>West Windsor Township</u>	NJ	West Windsor
<u>Woodbridge Township Police Department</u>	NJ	Woodbridge
<u>Lemoore Naval Air Station</u>	CA	Lemoore Station
<u>Burnham Police</u>	IL	Burnham
<u>Calumet Park Police</u>	IL	Calumet Park
<u>Dolton Police Department</u>	IL	Dolton
<u>Melrose Park Police Department</u>	IL	Melrose Park
<u>Bayonne Police Department</u>	NJ	Bayonne
<u>Bellmawr Police Department</u>	NJ	Bellmawr
<u>Bergenfield Police Department</u>	NJ	Bergenfield
<u>Camden Police Department</u>	NJ	Camden
<u>Closter Borough - Cresskill Borough</u>	NJ	Closter
<u>Closter Borough - Norwood Borough</u>	NJ	Closter
<u>Closter Borough Police Department</u>	NJ	Closter
<u>Dumont Borough Police Department</u>	NJ	Dumont
<u>East Brunswick Police Department</u>	NJ	East Brunswick
<u>Edison Police Department</u>	NJ	Edison
<u>Elizabeth Police Department</u>	NJ	Elizabeth
<u>Elmwood Park Borough Police Department</u>	NJ	Elmwood Park
<u>Englewood City Police Department</u>	NJ	Englewood
<u>Fair Lawn Police Department</u>	NJ	Fair Lawn
<u>Freehold Township Police Department</u>	NJ	Freehold Township
<u>Ft Lee Borough Police Department</u>	NJ	Ft Lee
<u>Gloucester County Communications - Woolwich Township</u>	NJ	Clayton
<u>Hackensack City Police Department</u>	NJ	Hackensack
<u>Hudson County Communications - Guttenberg Town</u>	NJ	Jersey City
<u>Hudson County Communications - North Bergen Township</u>	NJ	Jersey City

PSAP Name	PSAP State	PSAP City
<u>Hudson County Communications - West New York Town</u>	NJ	Jersey City
<u>Jersey City Police Department</u>	NJ	Jersey City
<u>Lincoln Park Police Department</u>	NJ	Lincoln Park
<u>Mahwah Township - Saddle River Borough</u>	NJ	Mahwah
<u>Marlboro Township Police Department</u>	NJ	Marlboro Township
<u>Middletown Township Police Department</u>	NJ	Middletown
<u>Monmouth County Communications - Colts Neck Township</u>	NJ	Freehold
<u>Monmouth County Communications - Ocean Township</u>	NJ	Freehold
<u>Montclair Township Police Department</u>	NJ	Montclair
<u>Montgomery Township Police Department</u>	NJ	Montgomery Township
<u>Montville Township Police Department</u>	NJ	Montville
<u>Morris County Communications - Rockaway Borough</u>	NJ	Parsippany
<u>Newark City Police Department</u>	NJ	Newark
<u>Northwest Bergen Regional Communications</u>	NJ	Ridgewood
<u>Northwest Bergen Regional Communications - Ramsey Borough</u>	NJ	Ridgewood
<u>Ocean County Communications North - Jackson Township</u>	NJ	Toms River
<u>Ocean County Communications North - Lakewood Township</u>	NJ	Toms River
<u>Ocean County Communications Ocean - Point Pleasant Borough</u>	NJ	Toms River
<u>Ocean County Communications South - Barnegat Township</u>	NJ	Toms River
<u>Old Bridge Township Police Department</u>	NJ	Old Bridge
<u>Paramus Borough</u>	NJ	Paramus
<u>Paramus Borough - Rochelle Park Township</u>	NJ	Paramus
<u>Paramus Borough - Tenafly Borough</u>	NJ	Paramus
<u>Park Ridge Borough</u>	NJ	Park Ridge
<u>Parsippany Police Department</u>	NJ	Parsippany
<u>Paterson City Police Department</u>	NJ	Paterson
<u>Pennsauken Township Police Department</u>	NJ	Pennsauken
<u>Piscataway Township Police Department</u>	NJ	Piscataway
<u>Ridgefield Borough - Edgewater Borough</u>	NJ	Ridgefield
<u>Ringwood Borough Police Department</u>	NJ	Ringwood
<u>Roseland Borough Police Department</u>	NJ	Roseland
<u>Roselle Park Police Department</u>	NJ	Roselle Park
<u>Saddle Brook Police Department</u>	NJ	Saddle Brook
<u>Secaucus Town Police Department</u>	NJ	Secaucus
<u>Somerset County Communications - Branchburg Township</u>	NJ	Somerset
<u>Sparta Police Department</u>	NJ	Sparta
<u>Wayne Township Police Department</u>	NJ	Wayne
<u>West Milford Township Police</u>	NJ	West Milford
<u>West Windsor Township</u>	NJ	Princeton Junction
<u>Woodbridge Township Police Department</u>	NJ	Woodbridge
<u>Cuyahoga Falls Police Department</u>	OH	Cuyahoga Falls
<u>Huber Heights Police</u>	OH	Huber Heights
<u>Kettering Police</u>	OH	Kettering

PSAP Name	PSAP State	PSAP City
<u>Lawrence County 9-1-1</u>	OH	Ironton
<u>Portage County Sheriffs Office</u>	OH	Ravenna
<u>Oklahoma City Police Department</u>	OK	Oklahoma City
Kane County Sheriff	IL	Geneva
Victoria Police Department	TX	Victoria
Calumet City Police	IL	Calumet City
East Lansing Police Department	MI	East Lansing
Independence Police Department	KS	Independence
Okaloosa County COPSCOM	FL	Crestview
Peach County	GA	Ft. Valley
Pike County 9-1-1 Center	PA	Milford
Vermont State Police-Rockingham	VT	Chester
Vermont State Police-Rutland	VT	Rutland
Salina Police Department	KS	Salina
Vilas County Sheriffs Department	WI	Eagle River
Henderson County Sheriffs Communications	NC	Hendersonville
Gary Police	IN	Gary
Lake Havasu Police Department	AZ	Lake Havasu
St John Police	IN	St John
Blue Island Police Department	IL	Blue Island
Macon-Bibb County E9-1-1 Center	GA	Macon
Royal Oak Police Department	MI	Royal Oak
Scottsdale PD	AZ	Scottsdale
Darien Area Dispatch Center	IL	Darien
Downers Grove Police	IL	Downers Grove
Hancock County E9-1-1	KY	Hawesville
Haverford Township Police Department	IL	Havertown
METCAD	IL	Urbana
Woodridge Police	IL	Woodridge
Jackson County Central Dispatch	MI	Jackson
Schaumburg Police Department	IL	
Gaston County Police Communications	NC	Gastonia
Hampshire County 9-1-1	WV	Romney
Putnam County E9-1-1	WV	Winfield
Carter County 9-1-1	TN	Elizabethton
Ford County Communications Center	KS	Dodge City
Luzerne County 9-1-1	PA	Wilkes-Barre
Monroe County 9-1-1	IL	Waterloo
Monroe County Control Center	PA	Stroudsburg
Muskogee Police Department	OK	Muskogee
Honolulu Police Department	HI	Honolulu
Maui Police Department	HI	Wailuku
Keith County Communications	NE	Ogallala
Antrim County Central Dispatch	MI	Bellaire
Batesville Police Department	MS	Batesville
Berrien County Public Safety Communication Center	MI	St Joseph
Bloomfield Township Police Department	MI	Bloomfield Hills

PSAP Name	PSAP State	PSAP City
Brookfield Police Department	MO	Brookfield
Buncombe County Emergency Communications	NC	Asheville
Butler County Emergency Communications District	AL	Greenville
Chicago Office of Emergency Communication-Zone 11	IL	Chicago
Chicago Office of Emergency Communication-Zone 4	IL	Chicago
Chicago Office of Emergency Communication-Zone 8	IL	Chicago
CHP-Indio Communications Center-Indio	CA	Indio
CHP-Inland CC-Riverside	CA	San Bernadino
Cook County Sheriffs Communications Center	IL	Des Plaines
Cumberland County Office of Emergency Preparedness	PA	Carlisle
Darien Police Department	CT	Darien
Dothan Police Department	AL	Dothan
EastCom - University Park	IL	Crete
Etowah County Communications District E9-1-1	AL	Gadsen
Ft Benning Military Police Activity	GA	Ft. Benning
Grenada Central Communications	MS	Grenada
Harvey Police Department	IL	Harvey
Hinsdale Police	IL	Hinsdale
Hood River County Dispatch Center	OR	Hood River
Joliet Communications	IL	Joliet
Kancomm	IL	Kankakee
Lancaster County-Wide Communications	PA	Manheim
Laurens County 9-1-1	SC	Laurens
Mason County ETSB	IL	Havana
Mercer County 9-1-1	WV	Princeton
Middletown Central Communications	CT	Middletown
New Milford Police Department	CT	New Milford
Noble County	IN	Albion
North Suburban Emergency Communication Center	IL	Des Plaines
Northwest Central Dispatch System	IL	Arlington Heights
Ottawa County Central Dispatch	MI	Grand Haven
Peoria ECC	IL	Peoria
Quinebaug Valley Emergency Communications Center	CT	Danielson
Ruston Police Department	LA	Ruston
Savannah - Chatham Metropolitan Police Department	GA	Savannah
Seneca Police	SC	Seneca
Southfield Public Safety	MI	Southfield
Southwest Central 9-1-1 System	IL	Palos Heights
Stamford Emergency Communication Center	CT	Stamford
Stephenson County 9-1-1	IL	Freeport
Suwannee County Sheriffs Office	FL	Live Oak
Tolland County Mutual Aid Emergency Communication Center	CT	Tolland
Towns County 9-1-1	GA	Young Harris
Washington County 9-1-1	TN	Johnson City
Washington County Communications	VA	Abingdon
Wescom	IL	Plainfield

<u>PSAP Name</u>	PSAP State	PSAP City
Will County Sheriff	IL	Joliet
Winnebago County 9-1-1	IL	Rockford
Wisconsin Dells Police Department	WI	Wisconsin Dells